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May 11, 1990

TO: Wayne Hedberg, Permit Supervisor

FROM: Holland Shepherd, Reclamation Soils Specialist HWS

RE: Revegetation/ Soils/ Wildlife Review of Barrick Mercur November 1988 Notice of Intent to Revise Mine Plans, M/045/017-88(1)

The following summarizes my review of the latest Barrick (March 15, 1990) response to the Division regarding the above Revision:

R613-004-107.5 - Soils

Page 49 of the MRP indicates that a silt fence will be installed north of topsoil stockpile T15 to help portect it from drainage. Since this topsoil stockpile sits in the middle of the Dead Horse Canyon drainage, the Divsion should require that the operator install something more substantial than a silt fence to divert drainage away from the stockpile. The Division suggests that a ripp-rapped earthern berm be constructed instead.

All topsoil stockpiles need to be marked accurately on the reference map. All pile volumes should be indicated in the plan narrative. Topsoil stockpile T18 is not marked on map 2.42, Post Reclamation Configuration. Topsoil stockpiles T18, T13 and T15 are given volumes in the plan. What are the volumes, each, for stockpiles T1, T2, T3, T4, T5, T6, T7, T7(a), T8 and T17.

The plan indicates (page 51b) that 908,398 yds. of topsoil have been stockpiled as of December 31, 1988. This figure is not consistent with 606,695 yards described in Barrick's 1989 Annual Report. What is the correct figure?

On page 51b, of the plan, a figure of 1,091,194 yds. is given for the volume of topsoil needed at final reclamation. This figure is inconsistent with 1,495,551 yds. given on page 60 of the plan table 2-4-3. If a total of 908,398 yds. exists, at this time, this leaves a deficit of 182,796 yds. in case one above, and 587,153 yds. in the second case. The operator must correct these inconsistencies.

Also, the Division will ask that the operator address the deficit question by explaining how it will be resolved. The operator will need to insert this language into the MRP explaining what will be done to compensate for the deficit. Will the operator make this up through future topsoil salvage or subsoil salvage; or will alternate technology be used for amending waste or overburden material where topsoil deficiencies remain? The Division could stipulate this requirement into a tentative approval letter.

R613-004-109 - Impact Assessment

The operator needs to update the Wildlife Mitigation section of the plan. The record indicates that the operator's tailings pond has been the source of mortalities within the deer and elk population. A meeting between the Division of Oil, Gas and Mining, Wildlife Resources and the operator was held in August of 1989. At that meeting, the operator committed to implement a set of mitigations, on site, to prevent further mortalities. Apparently, this has been done on the ground. The operator still needs to formalize these mitigations in the plan. I suggest we give Barrick until June 1st to submit this addendum to the existing 1983 Wildlife Mitigation Plan. This could be inserted onto page 62 of the existing MRP.

R613-004-106.2 - Operation Plan

The Division will require Barrick to perform a series of initial acid-base potential on identified waste material to be placed on the Sunrise dump. If these evaluations prove that the change of sulfide contamination is minimal, as indicated in the plan, the Division will not require further analyses. The operator must provide, to the Division, a plan describing the origin of the material tested, then provide original laboratory evaluations.

R613-004-111 - Reclamation Practices

No definitive reclamation plan yet exists for the tailings pond. It is questionable at this time what the reclamation requirements might be for this facility at the time it becomes due for reclamation. The Division should ask the operator to address this in the MRP, indicating that a specific plan has yet to be developed for the tailings pond reclamation. The operator should also commit to researching various types of reclamation in preparation for actual tailings reclamation at mine closure.

jb
WMN/2-3